

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEORA TUCKER,
Plaintiff

v.

CITY OF PHILADELPHIA
Defendant.

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CIVIL ACTION NO. 16-4649

JURY TRIAL DEMANDED

MOTION OF PLAINTIFF'S COUNSEL TO WITHDRAW

Isaac H. Green, Esquire, Movant, moves this Honorable Court to grant this motion to withdraw as counsel for plaintiff, Leora Tucker, and in support of the motion states as follows:

1. On January 5, 2017, Movant informed plaintiff that their attorney-client relationship, under the circumstances, could no longer continue.

2. Shortly thereafter, plaintiff advised Movant she was competent that she could represent herself pro se.

3. In light of the attorney-client conflict and plaintiff's decision to represent herself, Movant is filing this motion to withdraw his appearance in order for plaintiff can proceed pro se.

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order granting the motion to withdraw plaintiff counsel's appearance.


ISAAC H. GREEN, ESQUIRE

USDC-EDPA
JAN 17 2017

2017 JAN 17 P 1 04

EXHIBIT A

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DECLARATION OF ISAAC H. GREEN

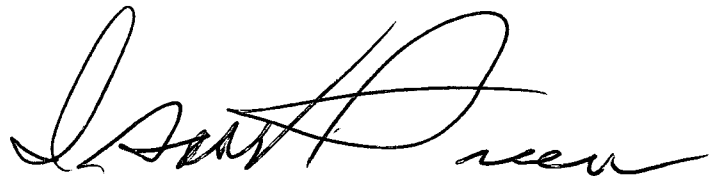
I, Isaac H. Green, an adult male, make this declaration in connection with the above-captioned matter. I declare under penalty of perjury that the following is true and correct:

1. I am the attorney of record for Leora Tucker, plaintiff in the above-captioned matter.

2. Pursuant to the terms of the contingency fee agreement signed by plaintiff, paragraph 4 provides in pertinent part as follows:

Plaintiff agrees attorneys shall have the right to withdraw their representation in the event of a breakdown in the attorney-client relationship.

3. On or about January 5, 2017, events giving rise to the breakdown of the attorney-client relationship occurred thereby creating the need for the filing of the motion to withdraw as counsel for plaintiff.

A handwritten signature in black ink, appearing to read 'Isaac H. Green', written over a horizontal line.

ISAAC H. GREEN

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CERTIFICATE OF SERVICE

I, Isaac H. Green, Esquire, certify that a true and correct copy of the foregoing Motion to Withdraw as Plaintiff's Counsel was sent via United States first class mail, postage prepaid, to the following:

Frank E. Wehr, II, Esquire
Assistant City Solicitor
City of Philadelphia Law Department
Labor & Employment Unit
1515 Arch Street, 16th Floor
Philadelphia, PA 19102-1595

Leora Tucker
5389½ Charles Street
Philadelphia, PA 19124


ISAAC H. GREEN, ESQUIRE

Date: January 17, 2017

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ORDER

AND NOW, this _____ of _____, 2017, upon
consideration of Plaintiff Counsel's Motion to Withdraw and the response thereto,
it is hereby **ORDERED** and **DECREED** that the motion is **GRANTED**.

BY THE COURT:

J.

2017 JAN 17 PM 7:04

USDC-EDPA
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